

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Rachael Decker,  
Plaintiff,

v.

United Collection Bureau, Inc.,  
Defendant.

Docket 3:20-cv-02229-RDM

(JUDGE ROBERT D. MARIANI)

FILED ELECTRONICALLY

**STIPULATION TO EXTEND SUMMARY JUDGMENT DEADLINE**

1. On August 16, 2023, the Court entered an Order setting a discovery deadline of September 22, 2023, and a dispositive motion deadline of October 23, 2023.
2. The parties have completed discovery.
3. However, the deposition transcript for Defendant's corporate designee has not yet been completed, and the designee also requested to read and sign a copy of the transcript.
4. It is expected that the transcript will be completed any day, and the witness will thereafter after 30-days to read and sign the completed version.
5. Plaintiff will be relying on the final version of this transcript in her forthcoming summary judgment motion.
6. Thus, in order to allow time for the transcript to be completed and finalized, the parties request that the deadline for summary judgment motions be extended by 45 days, up to and including December 7, 2023.

7. Additionally, Defendant's Second Motion to Dismiss is currently pending before the Court, and the resolution of that motion would likely allow the parties to streamline and focus the briefing necessary for the summary judgment motions.

8. Thus, in the event that the Second Motion to Dismiss is decided prior to the deadline to file summary judgment motions, it is likely that the decision would allow the parties to preserve resources, and may even obviate the need for the filing of summary judgment motions altogether.

WHEREFORE, the parties request that the Court approve this stipulation and extend the deadline for the filing of dispositive motions from October 23, 2023 until December 7, 2023.

**FREEMAN LAW**

/s/ Brett Freeman

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*Counsel for United Collection Bureau,  
Inc.*

**ORDER**

So ordered.

Date: \_\_\_\_\_

\_\_\_\_\_  
Robert D. Mariani  
United States District Judge